

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 422 & 455

**CERTIFICATE OF NO OBJECTION
REGARDING APPLICATION OF DEBTORS FOR
ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF KROLL RESTRUCTURING ADMINISTRATION LLC
AS ADMINISTRATIVE ADVISOR EFFECTIVE AS OF THE PETITION DATE**

The undersigned proposed counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading has been received to the *Application of Debtors for Entry of an Order Authorizing the Retention and Employment of Kroll Restructuring Administration LLC as Administrative Advisor Effective as of the Petition Date* [Docket No. 422] (the “Application”) that was filed under seal with the United States Bankruptcy Court for the District of Delaware (the “Court”) on February 13, 2025. Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Application (the “Proposed Order”). On February 18, 2025, the Debtors filed a redacted version of the Application [Docket No. 455]. Pursuant to the Notice of Application, objections or responses to the Application were to be filed and served on the undersigned proposed counsel by

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

February 27, 2025, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”). Prior to the Objection Deadline, the Debtors received informal questions regarding the Application from the U.S. Trustee. The Debtors provided informal responses to the U.S. Trustee and the parties agreed to entry of the Proposed Order. The undersigned further certifies that the Objection Deadline has passed, the Court’s docket has been reviewed in these cases, and the Debtors have not received any objections or informal comments to the Application and Proposed Order. It is hereby respectfully requested that the proposed Order attached to the Application be entered at the earliest convenience of the Court.

[Remainder of page intentionally left blank]

Dated: February 28, 2025

Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)

Stacy L. Newman (No. 5044)

Michael E. Fitzpatrick (No. 6797)

Jack M. Dougherty (No. 6784)

500 Delaware Avenue, Suite 1410

Wilmington, Delaware 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

Email: preilley@coleschotz.com
snewman@coleschotz.com
mfitzpatrick@coleschotz.com
jdougherty@coleschotz.com

*Proposed Co-Counsel to the Debtors
and Debtors in Possession*

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)

Aparna Yenamandra, P.C. (admitted *pro hac vice*)

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: joshua.sussberg@kirkland.com
aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*)

Jeffrey Michalik (admitted *pro hac vice*)

Lindsey Blumenthal (admitted *pro hac vice*)

333 West Wolf Point Plaza

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

Email: anup.sathy@kirkland.com
jeff.michalik@kirkland.com
lindsey.blumenthal@kirkland.com

*Proposed Co-Counsel to the Debtors
and Debtors in Possession*